

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

KEITH YAEGER, MICHAEL
SCHULER, JOSEPH
MONTGOMERY, BRYAN BAIR,
THOMAS VANLAARHOVEN,
LAURA HEGLE, KIM MARIE PAPA,
ROBERT TEDESCO, and NATALIE
TUZOVSKAYA, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

SUBARU OF AMERICA, INC., a New
Jersey Corporation, and FUJI HEAVY
INDUSTRIES, LTD., a Japanese
Corporation,

Defendants.

No. 1:14-cv-4490-JBS-KMW

CLASS ACTION

**DOCUMENT ELECTRONICALLY
FILED**

**NOTICE OF PLAINTIFFS' UNOPPOSED MOTION
FOR ATTORNEYS' FEES, EXPENSES AND INCENTIVE AWARDS**

PLEASE TAKE NOTICE that at the Final Fairness Hearing scheduled for 10:00 a.m. on July 26, 2016, Plaintiffs will move to have the Court enter the proposed order submitted herewith that will grant their unopposed motion seeking (1) the payment of \$1,500,000 to Plaintiffs' Counsel for the payment of their attorneys' fees and reimbursement of expenses, and (2) the payment of incentive awards in the amount of \$3,500 each for Plaintiffs Keith Yaeger, Michael Schuler,

Joseph Montgomery, Bryan Bair, Thomas Vanlaarhoven, Laura Hegle, Kim Marie Papa, Robert Tedesco, and Natalie Tuzovskaya (\$31,500 total).¹

PLEASE FURTHER NOTE that Plaintiffs will rely on the Memorandum of Law, Declarations of Counsel and other related materials in support of this motion.

PLEASE FURTHER NOTE that Defendants do not oppose this motion.

Dated: May 27, 2016

Respectfully submitted,

By: //s// Matthew D. Schelkopf
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¹ Plaintiffs will also request that the Court enter an order granting final approval to the settlement and dismissing this action with prejudice. A motion seeking that relief will be filed separately.

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*Attorneys for Plaintiffs
and the Settlement Class*

CERTIFICATE OF SERVICE

I, Matthew D. Schelkopf, hereby certify that the foregoing **PLAINTIFFS' UNOPPOSED MOTION FOR ATTORNEYS' FEES, EXPENSES AND INCENTIVE AWARDS** was filed on this 27th day of May, 2016 using the Court's CM/ECF system, thereby electronically serving it on all counsel of record in this case.

/s/ Matthew D. Schelkopf
Matthew D. Schelkopf